

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,)	
)	
Plaintiff,)	Civil Action No. 06-726 (JJF)
)	Civil Action No. 07-357 (JJF)
v.)	
)	CONSOLIDATED CASES
CHI MEI OPTOELECTRONICS)	
CORPORATION, et al.)	
)	
Defendants.)	
)	

**DECLARATION OF MACLAIN WELLS IN SUPPORT OF DEFENDANT CHI MEI
OPTOELECTRONICS CORPORATION'S MOTION TO
LIMIT THE NUMBER OF PATENTS-IN-SUIT AND STAY THE REMAINDER**

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Dated: August 5, 2008

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LIMIT THE NUMBER OF PATENTS-IN-SUIT AND STAY THE REMAINDER**

I, Maclain Wells, declare as follows:

1. I make this Declaration in support of Chi Mei Optoelectronics Corporation's Motion to Limit the Number of Patents-in-Suit and Stay the Remainder. The statements made in this Declaration are based on my own personal knowledge, and if called as a witness, I could and would testify competently to thereto.
2. I am an attorney at Irell & Manella LLP and am one of the attorneys representing Chi Mei Optoelectronics Corporation ("CMO") in this matter.
3. The parties have been engaged in negotiations to limit the number of terms for construction at least since they exchanged terms believed to require construction on June 24, 2008. The parties have also discussed focusing claim construction proceedings on a reduced number of patents by staying some of the patents-in-suit. For example, during a July 28, 2008 phone call, counsel for LG Display Co., Ltd. proposed reducing the number of patents for claim

construction proceedings by three patents per party. The parties were never able to reach agreement, however, and the negotiations ended that same day when counsel for AU Optoelectronics sent an e-mail indicating its position that "it is too early in the case" to limit the number of patents.

Executed on August 5, 2008, in Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America and the State of Delaware that the foregoing is true and correct.

/s/ Maclain Wells

Maclain Wells

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CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on August 5, 2008, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

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I hereby certify that on August 5, 2008 I have sent by E-mail the foregoing document to the following non-registered participants:

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